

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NATIONAL CITY BANK,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 07 C 6380
)	
CREATIVE FINANCIAL SOLUTIONS, LTD.;)	Judge Bucklo
EUGENE BENNETT; CHARLES WHITE;)	
SHELLY V. ROLLINSON; and TOMMY G.)	Magistrate Judge Cole
PILILIMIS,)	
)	
Defendants.)	
)	

**JOINT MOTION TO EXTEND THE COURT-ORDERED DEADLINE
FOR SUBMITTING EXPERT REPORTS**

Plaintiff National City Bank (“National City”) and Defendants Creative Financial Solutions, Ltd. (“Creative Financial”), Eugene Bennett, and Tommy G. Pililimis¹, and hereby jointly request that the Court extend the parties’ deadlines for submitting expert reports by six weeks. In support thereof, the parties state as follows:

1. Pursuant to the Court’s Scheduling Order, National City and Defendants’ deadlines for submitting expert reports are September 19, 2008, and October 17, 2008, respectively.

2. National City and Defendants Creative Financial and Eugene Bennett are currently exploring whether the case can be resolved.

3. Rather than incur the potentially unnecessary expense of retaining expert witnesses, National City and Defendants Creative Financial and Eugene Bennett respectfully

¹ Charles White was not served and has not appeared in this matter and, as such, need not consent to this motion. National City has already obtained a default judgment as to Defendant Shelly V. Rollinson.

request that the Court extend the deadline for submitting expert reports by six weeks or until October 31, 2008, and November 28, 2008, respectively.

4. Defendant Tommy G. Pililimis has consented to this motion.

WHEREFORE, National City and Defendants Creative Financial, Eugene Bennett, and Tommy G. Pililimis respectfully request that the Court extend the parties' deadlines for submitting expert reports by six (6) weeks or until October 31, 2008, and November 28, 2008, respectively.

Respectfully submitted,

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